

# Exhibit 3



Outlook

---

**RE: Wilkins, et al., v. City of Chicago -- Deposition Update**

---

**From** Sheehan, Michael P. <msheehan@taftlaw.com>

**Date** Wed 9/3/2025 3:03 PM

**To** Alexandra Block <ABlock@aclu-il.org>

**Cc** Joe DiCola <JDiCola@aclu-il.org>; Sheldon Solow <shel.solow@gmail.com>; Ahn, Joan E. <JAhn@taftlaw.com>; Winkowski, Elizabeth <EWinkowski@taftlaw.com>; xACLUCPD <xaclucpd@arnoldporter.com>; O'Brien, Barton <bobrien@taftlaw.com>

Alexandra,

Here is an update on our efforts related to the depositions:

We learned today that Officer Michael Donnelly recently went on the medical. We are trying to obtain information on when he will return from the medical but will have to reschedule his deposition scheduled for September 8.

Officer Pietryla has a conflict on his proposed deposition date. We would propose October 10 for his deposition.

Also, let us know whether October 21 or 28 worked for Officer Prozanski's deposition. We are still awaiting your response.

We made contact with Fred Melean and are awaiting a response from him on his availability.

We have spoken with Charlie Beck, he is checking his schedule for his availability. He resides in California and requests to appear for his deposition via Zoom or we will need to make arrangements for a location near his residence. Let us know your position.

We are following up with Barbara West and Stephen Chung on their availability as they indicated conflicts with the proposed dates. We will provide new dates.

We recently learned that Brian McDermott retired from CPD. We are in the process of obtaining contact information to determine his availability for deposition.

We recently made contact with Eddie Johnson and Garry McCarthy, we are in the process of confirming representation and availability for deposition on the proposed dates.

Please let us know the availability of plaintiffs Bell, Beasley, and Jefferson.

Thank you,  
Mike

---

**From:** Alexandra Block <ABlock@aclu-il.org>

**Sent:** Wednesday, September 3, 2025 9:22 AM

**To:** Sheehan, Michael P. <msheehan@taftlaw.com>

**Cc:** Joe DiCola <JDiCola@aclu-il.org>; Sheldon Solow <shel.solow@gmail.com>; Ahn, Joan E. <JAhn@taftlaw.com>; Winkowski, Elizabeth <EWinkowski@taftlaw.com>; xACLUCPD <xaclucpd@arnoldporter.com>

**Subject:** RE: Wilkins, et al., v. City of Chicago -- Deposition Update

Mike,

Plaintiffs have noticed 40 depositions of City witnesses, and we are awaiting confirmation of dates for 24 of those depositions. If you have additional information regarding scheduling those witnesses, we would appreciate an update today so we can provide accurate information to Judge Rowland at tomorrow's status.

If you would like to discuss, we are happy to set up a call today.

Thank you,  
Alexandra

---

**From:** Sheehan, Michael P. <[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)>  
**Sent:** Tuesday, August 26, 2025 12:27 PM  
**To:** Alexandra Block <[ABlock@aclu-il.org](mailto:ABlock@aclu-il.org)>  
**Cc:** Joe DiCola <[JDiCola@aclu-il.org](mailto:JDiCola@aclu-il.org)>; Sheldon Solow <[shel.solow@gmail.com](mailto:shel.solow@gmail.com)>; Ahn, Joan E. <[JAhn@taftlaw.com](mailto:JAhn@taftlaw.com)>; Winkowski, Elizabeth <[EWinkowski@taftlaw.com](mailto:EWinkowski@taftlaw.com)>  
**Subject:** RE: Wilkins, et al., v. City of Chicago -- Deposition Update

Alexandra,

As we previously advised, Deputy Director Waller had a conflict for his proposed deposition date. We would propose November 3 or 4 to produce him.

For Officer Prozanski, we would proposed October 21 or October 28.

Mr. McNaughton was available on September 24 if that is still a good date for Plaintiffs. Please confirm. With respect to Mr. McNaughton, the City requests that the parties stipulate that the Laquan McDonald matter be an area of inquiry that will not be pursued at his deposition as it has no relation to the claims in this matter. Please let us know your position.

Thank you,

Mike

**Michael P. Sheehan**

Partner

[msheehan@taftlaw.com](mailto:msheehan@taftlaw.com)

**Dir:** 312.836.4139

**Tel:** 312.527.4000 | **Fax:** 312.966.8498

111 E. Wacker Drive, Suite 2600

Chicago, Illinois 60601-4208

**[taftlaw.com](http://taftlaw.com)**

**Now over 1,100 attorneys strong.**

Taft is expanding to **Atlanta** and strengthening its **Washington, D.C.**, presence through a merger with Morris, Manning & Martin on Dec. 31, 2025. Learn more [here](#).

---

Taft has expanded to **Southeast Florida**, with the addition of Mrachek Law, a distinguished